UNTIED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

		
Margetta Langlois)	
)	Civil Action No. 04-11588-RWZ
v.)	
Michael Hugo et al)	
)	
)	

CERTIFICATION

- I, Samuel M. Pollack, certify that on October 15, 2004, I spoke with the plaintiff, Margetta Langlois.
 - 1. The plaintiff was unwilling to meet and confer regarding any discovery issues.
 - 2. The plaintiff was unwilling to submit a joint statement containing a proposed pretrial schedule:
 - 3. As a result of plaintiff's unwillingness to sign jointly, the defendants have submitted this pretrial schedule on their own behalf.
 - 4. On October 6, 2004, the defendants wrote a letter to the plaintiff in an attempt to make a good faith effort to meet and confer with the plaintiff, a copy of the aforementioned letter is attached hereto.

Respectfully submitted,

BBO# 560617

Pollack & Flanders, LLP

October 6, 2004

VIA U.S. MAIL Margetta Langlois P.O. BOX 3091 Holiday, FL 34690

RE: Margetta Langlois v. Michael Hugo et al

Dear Ms. Langlois,

Pursuant to Fed.R.Civ.P. 26(f), counsel for all parties shall confer no later than fourteen days before October 21, 2004, the date for our scheduling conference. As of the date of this letter, I have yet to hear from you regarding this matter. Please contact my office immediately, so that we can discuss the following:

- 1. preparing an agenda of matters to be discussed at the scheduling conference;
- 2. preparing a proposed pretrial schedule for the case that includes a plan for discovery, and
- 3. considering whether we will consent to trial by magistrate judge.

Further, a joint statement containing a proposed pretrial schedule is required to be filed five business days before the scheduling conference. This joint statement shall include:

- 1. a joint discovery plan scheduling the time and length for all discovery events;
- 2. a proposed schedule for the filing of motions; and
- 3. certifications signed by counsel and by an authorized representative of each party affirming that each party and that party's counsel have conferred

Lastly, since the allegations, in our analysis; are incomprehensible and illegible, could you please purpose what you anticipate for discovery.

Thank you for your attention to this matter.

Yours truly,

Samuel M. Pollack.

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CERTIFICATE OF SERVICE

I, Samuel M. Pollack, hereby certify that I have this day served a true copy of all pleading upon the opposing party by mailing a copy thereof to the party of record this 15th day of October, 2004.

amuel M. Pollack

Margetta Langlois P.O. BOX 3091 Holiday, FL 34690